

From: Sean Campbell <sean@woodcraig.com>
Sent: Monday, January 11, 2021 12:29 PM
To: Jennie E. Rogers
Cc: sia@woodcraig.com
Subject: Re: Angela Hoskins v. WM - Possible surgery

Jennie,

My client does relate the neck issues and the neck surgery to the wal-mart incident.

Sounds good let's go ahead and cancel.

I am of course agreeable to a discovery extension and will get you the total medical specials/
records we
have as of now and will supplement again after the surgery in february.

On Mon, Jan 11, 2021 at 12:24 PM Jennie E. Rogers <jrogers@mmatlaw.com> wrote:
Hi Sean,

Can you tell me the amount of the current medical expenses? When do you expect to get the supplemental records and bills to me?

Can you tell me if Plaintiff is alleging that the neck surgery is related to this Wal-Mart incident?

If so, we probably need to move the deposition until after the surgery and her recovery. I am sure we can get an extension on discovery under the circumstances.

Let me know and I will cancel the court reporter.

Thanks, Jennie

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From: Sean Campbell <sean@woodcraig.com>
Sent: Monday, January 11, 2021 12:18 PM
To: Jennie E. Rogers <jrogers@mmatllegal.com>
Cc: sia@woodcraig.com
Subject: Re: Angela Hoskins v. WM - Wed depo at my office - any more meds?

Hey Jennie,

There are certainly some additional records we are working on getting let me check if we have received any of those asap and get back to you.

Additionally, my client recently informed me she has a neck surgery scheduled for early February. Do you want to postpone the deposition until after that surgery takes place?